

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA	:	
	:	CRIMINAL INDICTMENT
v.	:	NO. 1:18-CR-00449-ELR-RGV
	:	
MANI CHULPAYEV,	:	
Defendant.	:	

MOTION TO CONTINUE SENTENCING HEARING

Comes now the defendant, Mani Chulpayev, by and through undersigned counsel who moves the Court for a continuance of his sentencing hearing. In support thereof, the defendant shows the Court the following:

1.

The sentencing hearing is currently scheduled for January 10, 2024.

2.

Counsel for Chulpayev has had a surgical procedure that has him homebound for the last few weeks. Additionally, counsel has been instructed not to drive for the next few weeks. Consequently, he has not been able to meet with Chulpayev to get the information needed to complete the presentence report and to identify which of the many transactions will be attributable to him for resolution.

3.

The government, by and through its authorized representative, Assistant United

States Attorney Garrett Bradford, has informed counsel for the defendant that there is no objection to the requested continuance.

Wherefore, the defendant, Mani Chulpayev, requests a thirty day continuance of his sentencing hearing in order to allow time for the outstanding issues to be completed.

Respectfully submitted,

/s/ Jay L. Strongwater

Jay L. Strongwater

Georgia Bar No. 688750

Attorney for Mani Chulpayev

Strongwater & Associates, LLC
Suite 2570
3340 Peachtree Road
Atlanta, Georgia 30326
404.872.1700

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true and correct copy of the within and foregoing pleadings upon counsel for the government by electronically posting through the District Court's ECF Filing System, addressed as follows:

Garrett Bradford, Esq.
Assistant United States Attorney
garrett.bradford@usdoj.gov

This 11th day of December, 2023.

/s/ Jay L. Strongwater
Jay L. Strongwater
Georgia Bar No. 688750
Attorney for Mani Chulpayev

Strongwater & Associates, LLC
Suite 2570
3340 Peachtree Road
Atlanta, Georgia 30326
404.872.1700